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Attorneys for Petitioner

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JEANNETTE FULLER HAUSLER as
Successor Personal Representative
of the Estate of ROBERT OTIS FULLER,
(“BOBBY FULLER”), *Deceased*, on behalf
of THOMAS CASKEY as Personal
Representative of the Estate of LYNITA
FULLER CASKEY, surviving daughter
of ROBERT OTIS FULLER, The
ESTATE OF ROBERT OTIS FULLER,
FREDERICK FULLER, FRANCIS
FULLER, GRACE LUTES, JEANNETTE
FULLER HAUSLER, and IRENE MOSS,

Petitioner

v.

JP MORGAN CHASE BANK, N.A.,
CITIBANK, N.A., UBS AG, THE ROYAL
BANK OF SCOTLAND N.V.
(FORMERLY KNOWN AS ABN AMRO,
N.V.), BANK OF AMERICA, N.A., and
NATIONAL BANK OF CANADA,

Garnishee-Respondents.

JPMORGAN CHASE BANK, N.A.,
CITIBANK, N.A., UBS AG, THE ROYAL BANK
OF SCOTLAND N.V. (FORMERLY KNOWN AS)

09 Civ. 10289 (VM)

(Related to the JPM Chase/Citibank
Turnover Proceeding -- Tranche III)

**SUPPLEMENTAL
DECLARATION IN SUPPORT
OF MOTION FOR JUDGMENT
ON THE PLEADINGS AND
FOR TURNOVER ORDER**

RE: Fidel Castro Ruz, Raul Castro
Ruz, The Republic of Cuba, and
The Cuban Revolutionary Armed
Forces

[JUDGMENT DEBTORS]

ABN AMRO BANK N.V.), and BANK OF)
 AMERICA, NATIONAL ASSOCIATION,)
)
 Garnishee-Respondents)
 and Third-Party Petitioners,)
)
 v.)
)
 BANCO FINANCIERO INTERNACIONAL S.A.,)
 BANCO INTERNACIONAL DE COMERCIO,)
 S.A., BANCO NACIONAL DE CUBA, BANCO)
 POPULAR DE AHORRO, ABBOTT)
 LABORATORIES, INC., as successor to Quimica)
 Knoll de Mexico, S.A. de C.V., AEROFLOT)
 LINEAS AEREAS SOVIETICAS, ALBET)
 INGENIERA Y SISTEMAS, BANCO BILBAO)
 VIZCAYA ARGENTARIA, S.A., BANCO)
 BILBAO VIZCAYA ARGENTARIA PANAMA,)
 S.A., as successor to Banco Exterior Panama, S.A.,)
 BANCO DE CREDITO DEL PERU, as successor)
 to Financiera Nacional S.A., BANCO DE)
 ESPANA, BANCO ESPANOL DE CREDITO,)
 BANCO MONEX S.A., BANCO NACIONAL)
 DE MEXICO, S.A., BANCO PAULISTA S.A.,)
 BNP PARIBAS, BNP PARIBAS ESPANA, S.A.,)
 BANCO SANTANDER S.A., BANCO)
 SANTANDER TOTTA, S.A., as successor to)
 Banco Totta & Acores S.A., CAJA DE AHORROS)
 Y MONTE DE PIEDAD DE MADRID, CASA DE)
 CAMBIO MONEX, S.A., CREDIT SUISSE)
 GROUP AG, as successor to Swiss American)
 Securities, DRESDNER LATEINAMERIKA A.G.,)
 as successor to Dresdner Bank Lateinamerika A.G.,)
 ESTUDIOS MERCADOS Y SUMINISTROS S.L.,)
 GREEN DOWA HOLLAND BV, HSBC)
 TRINKAUS & BURKHARDT AG, ING BANK)
 N.V., INSTITUTO DE CARDIOLOGIA Y)
 CIRUGIA CARDIOVASCULAR CUBA,)
 INTERNATIONAL HANDLERS, INC., JSC)
 ZARUBEZHTSVETMET, LTU)
 LUFTRANSPORT-UNTERNEHMEN GMBH,)
 NOVAFIN FINANCIERE S.A., PETROLEOS DE)
 VENEZUELA S.A., PHILIPS MEXICANA S.A.)
 DE C.V., PREMUDA S.P.A., SANPAOLO)
 BANK S.A., SELECMAR SHIP MANAGEMENT,)
 TUI UK LTD., as successor to Britannia Airways)

Ltd., TRYG FORSIKRING, as successor to)
Baltica Bank and Baltica Forsikring, UNION)
BANCAIRE PRIVEE, VITOL ENERGY)
(BERMUDA) LTD and JEANNETTE FULLER)
HAUSLER as Successor Personal Representative)
of the Estate of ROBERT OTIS FULLER)
("BOBBY FULLER"), Deceased, on behalf of)
THOMAS CASKEY as Personal Representative)
of the Estate of LYNITA FULLER CASKEY,)
surviving daughter of ROBERT OTIS FULLER,)
THE ESTATE OF ROBERT OTIS FULLER,)
FREDERICK FULLER, FRANCIS FULLER,)
GRACE LUTES, JEANNETTE FULLER)
HAUSLER, and IRENE MOSS,)
)
Adverse Claimants-)
Respondents.)
)

JAMES W. PERKINS, an attorney duly-admitted to practice law in the State of New York, declares:

1. I am a member of the bar of this Court and a Shareholder of the firm of Greenberg Traurig, LLP, counsel to Petitioner Jeannette Hausler ("Petitioner" or "Hausler") in the above-captioned proceedings. I make this declaration in further support of Petitioner's motion (a) pursuant to Federal Rule of Civil Procedure 12(c) granting judgment in her favor on the interpleader petition and (b) for an order granting turnover of funds held Bank of America, N.A., Citibank, N.A., JPMorgan Chase Bank, N.A., Royal Bank of Scotland N.V. (f/k/a ABN AMRO, N.V.), and/or UBS, AG ("Respondents"). It is to supplement my Declaration dated and filed April 15, 2011 (the "April 15 Declaration") in support of Petitioner's motion and submitted in order to correct statements made in paragraphs 16, 20 and 21 of that Declaration as set forth below. The facts set forth herein are based on my personal knowledge, including information I obtained from counsel for the Third Party Petitioners and otherwise as counsel of record for Petitioner.

2. Paragraph 16 of the April 15 Declaration is corrected to state in its entirety: “Attached hereto as Exhibit O is a true and correct copy of an e-mail dated March 8, 2011, from Respondent Banks’ counsel, which contains a report (the “Report”) of service of process on the various interpleader respondents.”

3. Paragraph 20 of the April 15 Declaration is corrected to state: “According to the Report, as of March 7, 2011, Respondent Banks had been unable to serve the following entities: International Handlers, Inc., Aeroflot Lineas Aereas Sovieticas (d/b/a Aeroflot Lineas Aereas Rusas), JSC ZARUBEZHTSVETMET, also referred to as AO VO ZARUBEZHTSVETMET, and were unable to confirm service on HSBC Trinkaus Burkhardt AG, Banco Nacional de Cuba, Banco Financiero Internacional S.A., Banco Popular de Ahorro, Albet Ingeniera y Sistemas, Instituto de Cardiologia y Cirugía Cardiovascular Cuba, and Selecmar Ship Management. The Report further indicates that a second attempt at service has been made on Trinkaus Burkhardt AG, Banco Nacional de Cuba, Banco Financiero de Cuba, Banco Popular de Ahorro, Albet Ingeniera y Sistemas, Instituto de Cardiologia y Cirugía Cardiovascular Cuba. Service through the Clerk of the Court had been initiated as of that date on each of Banco Nacional de Cuba, Banco Financiero Internacional S.A., Banco Popular de Ahorro, Albet Ingeniera y Sistemas, Instituto de Cardiologia y Cirugía Cardiovascular Cuba, and Selecmar Ship Management.”


4. Paragraph 21 of the April 15 Declaration is corrected to state: “According to the Report, and as otherwise advised by Third-Party Petitioner’s counsel, the Interpleader Petitioners had as of March 7, 2011 delivered the Interpleader Petition III to the relevant foreign central authorities for service upon the following entities, among others: (a) Banco Bilbao Vizcaya Argentaria Panama, S.A., as successor to Banco Exterior Panama, S.A., (b) Banco Monex, S.A., (c) Banco de España, (d) Banco Nacional de Mexico, S.A., (e) Banco Paulista, S.A., (f) BNP

Paribas, (g) BNP Paribas Espana, S.A., (h) Banco del Credito Del Peru, as successor to Financiera National S.A., (i) Credit Suisse Group AG, as successor to Swiss American Securities, (j) Vitol Energy (Bermuda) Ltd., (k) Green Dowa Holland BV, (l) ING Bank N.V., (m) Petroleos de Venezuela S.A., (n) Philips Mexicana S.A. de C.V., (o) SanPaolo Bank S.A., (p) TUI UK LTD., as successor to Britannia Airways, Ltd., (q) TRYG FORSIKRING, as successor to Baltica Bank and Baltica Forsilkring, and (r) Union Bancaire Privee. Service has been completed on: (a) Credit Suisse Group AG, as successor to Swiss American Securities, (b) Vitol Energy (Bermuda) Ltd., (c) SanPaolo Bank S.A., (d) TUI UK LTD., as successor to Britannia Airways, Ltd., and (e) TRYG FORSIKRING, as successor to Baltica Bank and Baltica Forsilkring. Each of these latter entities has failed to file a responsive pleading or otherwise appear, and, thus, is in default.”

5. The balance of the April 15 Declaration remains true and correct in all respects.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: New York, New York
May 4, 2011



James W. Perkins